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March 8, 2010

VIA ECF

Chief Judge Mark L. Wolf
United States District Court
District of Massachusetts (Boston)
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Re: USA v. HUMZA ZAMAN
Criminal Docket No. 09-cr-10054-1

Dear Judge Wolf:

This letter refers to the above captioned matter which appears for Sentencing before Your Honor on Thursday, March 11, 2010 at 3:00 PM.

It is respectfully requested that the matter be adjourned for at least 30 days for the following reasons. First, I received a jury verdict on United States of America vs. Juan Carlos Penalo-Rodriguez 07-cr-00008 on Friday, March 5, 2010. I then immediately began selecting a jury on State v. Ramon Colon in Hackensack, New Jersey. This matter will take at least three (3) weeks to complete trying. There are four (4) codefendants on that matter and it pertains to a Defendant who has been incarcerated for three (3) years pending trial.

Secondly, and most importantly, Mr. Zaman, the Defendant in this case has deteriorated mentally such that I am attempting to secure some form of drug/mental treatment. It has come to a point where Mr. Zaman will seek admission into a short term narcotics program to alleviate whatever stress he cannot cope at this time. I will report to this court within the next week his progress and the name of the reputable facility/provider he has chosen to address his needs. I consent to the exclusion of time until the day of Sentence, pursuant to the Speedy Trial Act.

Thank you in advance for any time or consideration you show this request. I remain,

Sincerely yours,

s/ Patrick J. Brackley
Patrick J. Brackley, Esq.

PJB/mb

CERTIFICATE OF SERVICE

I, Patrick J. Brackley, Esquire, hereby certify that on this 9th day of March, 2010, a copy of the foregoing **MOTION TO CONTINUE** was electronically served upon Assistant United States Attorney Stephen Heymann, Office of the United States Attorney, One Courthouse Way, Boston, Massachusetts, 02210

s/ Patrick J. Brackley
Patrick J. Brackley, Esq.